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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MATTHEW JACKSON,

Defendant.

No. 4:24-cr-00018-RRB-SAO

COUNTS 1-3

CYBERSTALKING

Vio. of 18 U.S.C. § 2261A(2),  
§ 2261(b)(4)

COUNTS 4-6

SEXUAL EXPLOITATION OF A CHILD:  
PRODUCTION OF CHILD  
PORNOGRAPHY

Vio. of 18 U.S.C. § 2251(a), (e)

COUNT 7

SEXUAL EXPLOITATION OF A CHILD:  
POSSESSION OF CHILD  
PORNOGRAPHY

Vio. of 18 U.S.C. §2252A(a)(5)(B) and  
(b)(2).

CRIMINAL FORFEITURE ALLEGATION:

18 U.S.C. § 2253 and 28 U.S.C. § 2461(c)

**INDICTMENT**

The Grand Jury charges that:

### COUNT 1

Beginning on or about December 29, 2021, and continuing through on or about July 11, 2023, within the District of Alaska, the defendant, MATTHEW JACKSON, with the intent to injure, harass, and cause substantial emotional distress to Adult Victim 1, used facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person.

The Government further alleges that the defendant's conduct constituted an offense under chapter 109A, to wit, Sexual Abuse in violation of 18 U.S.C. § 2242(3), had the offense been committed in the special maritime and territorial jurisdiction of the United States.

All of which is in violation of 18 U.S.C. § 2261A(2), §2261(b)(4).

### COUNT 2

Beginning on or about December 29, 2021, and continuing through on or about July 11, 2023, within the District of Alaska, the defendant, MATTHEW JACKSON, with the intent to injure, harass, and cause substantial emotional distress to Minor Victim 1, used facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person.

The Government further alleges that the defendant's conduct constituted an offense under chapter 109A, to wit, Sexual Abuse in violation of 18 U.S.C. § 2242(3), had the offense been committed in the special maritime and territorial jurisdiction of the United States.

All of which is in violation of 18 U.S.C. § 2261A(2), §2261(b)(4).

### COUNT 3

Beginning on or about December 29, 2021, and continuing through on or about July 11, 2023, within the District of Alaska, the defendant, MATTHEW JACKSON, with the intent to injure, harass, and cause substantial emotional distress to Minor Victim 2, used facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person.

The Government further alleges that the defendant's conduct constituted an offense under chapter 109A, to wit, Sexual Abuse in violation of 18 U.S.C. § 2242(3), had the offense been committed in the special maritime and territorial jurisdiction of the United States.

All of which is in violation of 18 U.S.C. § 2261A(2), §2261(b)(4).

### COUNT 4

Beginning on or about December 29, 2021, and continuing through on or about July 11, 2023, within the District of Alaska, the defendant, MATTHEW JACKSON, did employ, use, persuade, induce, entice, and coerce Minor Victim 1, with the intent that such

minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; was transported and transmitted using any means and facility of interstate and foreign commerce; and was transported in and affecting interstate and foreign commerce.

All of which is a violation of 18 U.S.C. § 2251(a), (e).

#### COUNT 5

Beginning on or about December 29, 2021, and continuing through on or about July 11, 2023, within the District of Alaska, the defendant, MATTHEW JACKSON, did employ, use, persuade, induce, entice, and coerce Minor Victim 2, with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; was transported and transmitted using any means and facility of interstate and foreign commerce; and was transported in and affecting interstate and foreign commerce.

All of which is a violation of 18 U.S.C. § 2251(a), (e).

### COUNT 6

Beginning or about December 29, 2021, and continuing through on or about July 11, 2023, within the District of Alaska, the defendant, MATTHEW JACKSON, did employ, use, persuade, induce, entice, and coerce Minor Victim 3, with the intent that such minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; was transported and transmitted using any means and facility of interstate and foreign commerce; and was transported in and affecting interstate and foreign commerce.

All of which is a violation of 18 U.S.C. § 2251(a), (e).

### COUNT 7

On or about August 1, 2023, in the District of Alaska, the defendant, MATTHEW JACKSON, knowingly possessed and attempted to possess material that contained an image of child pornography, as defined in 18 U.S.C. § 2256(8)(A) and (C), which had been mailed, shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All of which is in violation of 18 U.S.C. §2252A(a)(5)(B) and (b)(2).

### CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Counts 4-7 are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253.

Upon conviction of the offenses in violation of 18 U.S.C. § 2251(a), (b), (e), or 18 U.S.C. § 2252A(a)(5)(B), (b)(2), as set forth in Counts 4-7 of this Indictment, the defendant, MATTHEW JACKSON, shall forfeit to the United States pursuant to 18 U.S.C. § 2253 any property, real or personal, that was used or intended to be used to commit or to promote the commission of such violations or any property traceable to such property, including, but not limited to:

- iPhone 13 Pro Max

All pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Carly Vosacek  
CARLY VOSACEK  
Assistant U.S. Attorney  
United States of America

s/ Kate Vogel for  
S. LANE TUCKER  
United States Attorney

DATE: 11/19/24